



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

RMT:ADW  
F. #2020R00142

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 8, 2020

By ECF and Email

Gordon Mehler, Esq.  
Mehler Law PLLC  
747 Third Avenue, 32nd Floor  
New York, New York 10017

Re: United States v. Keith Levy  
Criminal Docket No. 20-87 (RPK)

Dear Mr. Mehler:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides additional discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosure under cover of letter dated March 5, 2020. The government renews its request for reciprocal discovery from the defendant.

The enclosed contains the following:

- Recordings of phone calls made or received by the defendant between February 13, 2020 and March 11, 2020, while incarcerated at the Metropolitan Detention Center, Bates-numbered LEVY000052;
- Records obtained from Sprint Corporation, Bates-numbered LEVY000053 – LEVY000054;
- New York State Department of Corrections and Community Supervision ("DOCCS") Parolee Chronology Report, Bates-numbered LEVY000055 – LEVY000087;
- Documents relating to the matter of State of New York v. Keith D. Levy, Case No. 2005-0709, in New York State Broome County Court, Bates-numbered LEVY000088 – LEVY000126;
- Text messages between the defendant and a DOCCS parole officer, Bates-numbered LEVY000127 – LEVY000137;

- A video recording of a New York City Police Department (“NYPD”) interview of the defendant on August 9, 2019, Bates-numbered LEVY000138; and
- Copies of NYPD investigative reports, which reflect statements made by the defendant, Bates-numbered LEVY000139 – LEVY000140.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Andrew D. Wang  
Andrew D. Wang  
Assistant U.S. Attorney  
(718) 254-6311

Enclosures

cc: Clerk of the Court (RPK) (by ECF) (without enclosures)